

ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FORT WORTH DIVISION

2018 JAN 11 PM 1:27

CLERK OF COURT

UNITED STATES OF AMERICA

v.

NO. 4:17-CR-176-A (03)

JESSIE ALAN HUCKEL, (03)

a.k.a. Rome Huckel

**DEFENDANT'S UNOPPOSED MOTION FOR A 7-DAY EXTENSION
TO FILE RESPONSE TO GOVERNMENT'S OBJECTIONS TO PSR ADDENDUM AND
SENTENCING MEMORANDUM**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Jessie Alan Huckel, and submits this unopposed motion for a 7-day Extension to File his Response to the Government's Objections to the PSR Addendum and Sentencing Memorandum and would show the following:

I.

The sentencing date is currently set for March 13, 2018 at 10:00 a.m.

II.

Pursuant to the Court's December 20, 2017 Scheduling Order, paragraph 11 states:

(11) Each party deliver to the court, the probation officer, and counsel for the parties **by 4:00 p.m. on January 11, 2018**, (i) a written response to the opposing party's objections to the addendum, (ii) any other item the party wishes the court to consider in connection with sentencing, such as a sentencing memorandum or character letters.

III.

Undersigned counsel requests a 7-day extension of time to file his Response to the Government's Objections to the PSR Addendum and to file Sentencing Memorandum, including character letters, until January 18, 2018. Counsel is requesting this 7-day extension to allow

time for the gathering of additional information for Huckel's sentencing memorandum and to finish conducting legal research regarding issues raised in the Government's response to the PSR Addendum.

In addition, Counsel has been engaged in the following federal matters:

- *United States v. Rodney Roquemore*, NDTX, Cause No. 3:17-CR-567-M (discovery and plea negotiations)
- *United States v. Crystal Sharkey*, NDTX, Cause No. 3:17-CR-573-D (discovery and plea negotiations)
- *United States v. Khalid Al-Haj*, (appeal from a jury trial) 5th Cir., Appeal No. 17-10801, **filed 12/28/2017**
- *United States v. Azam Doost*, DCD, 1:17-CR-109 (Jury Trial preparation, in California 1/4/18-1/5/18 working on case with client)
- *United States v. Alejandro Reyes*, (appeal from a jury trial) Appeal No. 17-40857, **filed 1/3/2018**.

This extension will not interfere with or delay the sentencing date of March 13, 2018.

IV.

Counsel has conferred with AUSA Frank Gatto regarding said motion for a 7-day extension of time, and he has no opposition.

V.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this motion for a 7-day Extension to File his Response to Government's Objections the PSR Addendum and to file his Sentencing Memorandum be granted.

Respectfully submitted,

/s/ Kevin B. Ross
KEVIN B. ROSS, P.C.
State Bar of Texas Card No. 24033020

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Attorney for Jessie Alan Huckel

CERTIFICATE OF CONFERENCE

The undersigned certifies that on this 11th day of January, 2018, I conferred with Frank Gatto, attorney for the government, and he stated that the government has no opposition to the granting of this motion.

/s/ Kevin B. Ross
KEVIN B. ROSS

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing Defendant's Motion was delivered via electronic means (ECF) to Frank Gatto, Assistant United States Attorney, 801 Cherry Street, Suite 1700, Fort Worth, Texas 76102, to frank.gatto@usdoj.gov, on this the 11th day of January, 2018.

/s/ Kevin B. Ross
KEVIN B. ROSS

**IN THE UNITED STATES DISTRICT COURT
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v.

NO. 4:17-CR-176-A (03)

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a.k.a. Rome Huckel

ORDER

On this _____ day of _____, 2018 came to be heard Defendant's Motion for a 7-day Extension to File Response to the Government's Objections to the PSR Addendum and Sentencing Memorandum. Said motion is hereby GRANTED. Defendant's response to the PSR Addendum and Sentencing Memorandum are due **by 4:00 p.m. on January 18, 2018.**

UNITED STATES DISTRICT JUDGE